

Cravath, Swaine & Moore LLP

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MEMO ENCLOSED

March 7, 2008

Colliton v. Cravath, Swaine & Moore LLP,
No. 08 Civ. 0400 (NRB)

Dear Judge Buchwald:

On March 4, 2008, defendant Cravath, Swaine & Moore LLP ("Cravath") received by first-class mail Plaintiff's Amended Complaint, a copy of which is enclosed. The Amended Complaint comprises 60 single-spaced pages, 299 paragraphs, purports to assert 20 claims for relief and raises a variety of new, scurrilous and false allegations, including numerous baseless accusations of unethical and/or criminal activities by specific members of this Firm.

Cravath respectfully requests that it be permitted to move to dismiss the Amended Complaint no later than April 21, 2008. This is our first request for an extension of the filing deadline. We also request permission to make further application at the same time (1) in the alternative, pursuant to Fed. R. Civ. P. 12(f), to strike portions of the Amended Complaint, and/or (2) for sanctions pursuant to Fed. R. Civ. P. 11. Finally, Cravath requests that it be permitted to file a brief (in support of all relief requested) not to exceed 50 pages in order to deal with the additional issues raised by the Amended Complaint.

If the Court would prefer to have a pre-motion conference to discuss any of the above, Cravath is prepared to appear at the Court's convenience.

Our response to the Amended Complaint is currently due on March 17, 2008. We respectfully request that this Court adjourn Cravath's obligation to respond either to April 21, 2008, or, if the Court wishes to hold a conference to discuss a

Endorsement

Defendant's motion to dismiss and related requests for relief is due April 14, 2008. Plaintiff's answering papers are due May 19, 2008. Defendant's reply is due June 3, 2008. The moving and answering papers shall not exceed 35 pages. The reply brief shall not exceed 15 pages. S. J. Daniel.
Hon. David Buchwald, dated 3/10/08

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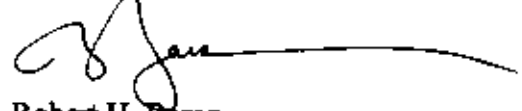
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OF COUNSEL
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procedure and schedule for the motion described above, then without date pending such conference.

Respectfully,

A handwritten signature in black ink, appearing to read 'Robert H. Baron', with a long horizontal flourish extending to the right.

Robert H. Baron

The Honorable Naomi Reice Buchwald
United States District Court
Southern District of New York
United States Courthouse
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New York, NY 10007

Encl.

BY FIRM MESSENGER

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